REMARKS

Applicants thank the Examiner for his careful consideration of this application. Reconsideration of this application is now respectfully requested in view of the above amendments and the following remarks.

Claims 1-20 remain pending in this application, with Claims 1, 9, and 12 being independent claims. New Claims 21-23 have been added, resulting in Claims 1-23 now being pending.

Applicants note that their Information Disclosure Statement (IDS) filed on May 10, 2006 was not indicated as having been considered. Applicants request that this IDS be considered and that indication of such consideration be included with the next Office Action.

At page 2, the Office Action objects to the title. A new title has now been provided.

At page 2, the Office Action also objects to the specification as not providing proper antecedent basis for the claimed subject matter, based on use of the term, "computer accessible medium." Applicants respectfully submit that this term, as well as the term, "machine accessible medium," as used in some of the claims, is supported by the disclosure, at least at paragraph [0042], which gives numerous examples of such media. However, for the sake of expedience, Applicants have amended paragraph [0042] to explicitly include this term.

At page 2, the Office Action makes a statement (not a formal objection or rejection) based on Applicants' use of the term "stack-state-aware translation" in the claims (e.g., in Claim 1). Applicants note that this term is supported in the specification at least at paragraph [0029].

At pages 3-8, the Office Action rejects Claims 1-20 under 35 U.S.C. § 102(b) as being anticipated by Lindwer (U.S. Patent No. 6,298,434). These rejections are respectfully traversed for the following reasons.

Claim 1 recites, among other things, "performing a stack-state-aware translation of the instruction to threaded code to determine an operand stack state for the instruction." Claim 9 recites, among other things, "an interpreter to determine a state of the operand stack, translate the instruction into threaded code, and dispatch the instruction based on the state of the operand stack." Claim 12 recites, among other things, "translating a virtual machine instruction into threaded code based on an operand stack state of the virtual machine instruction." It is noted that all three of these limitations include translation of an instruction into *threaded code*. The Office Action, at page 3, Item 4, page 5, Item 12, and pages 5-6, Item 15, asserts that Lindwer at col. 11, lines 3-22 discloses this limitation. However, nowhere in this portion of Lindwer have Applicants found any disclosure of translating an instruction into threaded code, nor have Applicants been able to find such disclosure anywhere else in Lindwer. For at least this reason, Claims 1, 9, and 12, as well as their respective dependent claims, are allowable over the cited prior art.

Applicants further note that the rejection of Claim 2 (page 3, Item 5) appears to be incomplete. In particular, there appears to be text missing from this paragraph, and in view of this, there is no showing that the limitation of "determining a number of operands on the operand stack after the instruction is executed . . ." is disclosed by the cited reference. Therefore, it is respectfully submitted that Claim 2 has not been properly rejected. Therefore, unless it can be

properly rejected, it is respectfully submitted that Claim 2 is allowable over the cited prior art.

Applicants have added new Claims 21-23, which depend, respectively, from Claims 1, 9, and 12. Each of these claims recite the determination of an entry point into shared execution code. These claims are supported by many portions of the specification, including, for example, paragraph [0028] and Figure 4. Applicants have found no disclosure in Lindwer of such a feature, so it is respectfully submitted that these claims, too, are allowable over the cited prior art.

Applicants further note that they do not necessarily agree with the characterizations of either their claims or of the prior art, as discussed in the Office Action and not addressed above, but rather have chosen to focus on what they currently deem to be their strongest arguments. This is not to be understood as tacit concurrence with such characterizations or waiver of additional arguments.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed,

accommodated, or rendered moot. Applicants, therefore, respectfully request that the Examiner

reconsider all presently outstanding objections and rejections and that they be withdrawn.

Applicants believe that a full and complete reply has been made to the outstanding Office Action

and, as such, the present application is in condition for allowance. If the Examiner believes, for

any reason, that personal communication will expedite prosecution of this application, the

Examiner is hereby invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment is respectfully requested.

Respectfully submitted,

/Jeffrey W. Gluck/

Date: June 14, 2006

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